

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,

Debtors.¹

Chapter 11

Case No. 23-11069 (CTG)

Jointly Administered

**NOTICE OF PERFECTION, MAINTENANCE, AND CONTINUATION
OF LIENS OF PIEPER-HOUSTON ELECTRIC, L.P. UNDER 11 U.S.C. § 546(b)**

Pieper-Houston Electric, L.P. (“Pieper”), a creditor and party-in-interest in the chapter 11 bankruptcy cases (the “Bankruptcy Cases”) of the above-captioned debtors and debtors-in-possession (the “Debtors”), files this *Notice of Perfection, Maintenance, and Continuation of Liens Under 11 U.S.C. § 546(b)* (the “Notice”) and would respectfully represent the following:

1. On August 6 and 7, 2023 (the “Petition Date”), Yellow Corporation and its affiliated debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors continue to operate their business and manage their properties as debtors and debtors-in-possession pursuant to Bankruptcy Code sections 1107(a) and 1108.

2. Prior to the Petition Date, Pieper provided services, material, and/or equipment pursuant to a contract between Pieper and debtor, YRC Inc. (d/b/a YRC Freight) (“YRC”) in connection with the development of, and the construction of certain improvements to a tract of land in Harris County, Texas (the “Land”). Debtor, YRC, is the holder of a leasehold interest in all or a portion of the Land (the “Leasehold Interest”), and is the owner of certain improvements on the Land (the “Improvements” and, together with the Leasehold Interest, the “Property”).

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 10990 Roe Avenue, Overland Park, Kansas 66211.

3. Pieper is owed \$19,954.68 for its work plus accruing attorney's fees, interest, and other charges.

4. As a result of its work, Pieper recorded a lien affidavit (the "Lien Affidavit") in the Real Property Records of Harris County, Texas, thereby perfecting a lien (the "Lien") against the Property. A true and correct copy of the Lien Affidavit is attached hereto as **Exhibit 1**.

5. Pieper hereby files this Notice of perfection and continuation of the Lien pursuant to Bankruptcy Code section 546(b). Pieper files this Notice to apprise the Debtors and all other parties claiming an interest in the Property (including in all removables, improvements, proceeds, cash collateral, replacements, accessions, products, rents, and profits of the Property) of Pieper's intent to continue, maintain, and/or enforce its Lien, rights, and interests and to comply with any and all present and/or future notice, perfection, maintenance, and enforcement requirements under the Bankruptcy Code, the Texas statutes, and the Texas constitution, and all other applicable non-bankruptcy law. Furthermore, Pieper files this Notice to ensure that the perfected status of its Lien will be maintained and continued while these Bankruptcy Cases remain pending and the automatic stay under Bankruptcy Code section 362 remains in place.

Reservation of Rights

6. The filing of this Notice shall not be construed as an admission that such filing is required under the Bankruptcy Code, the Texas statutes, the Texas constitution, or any other applicable law. Further, Pieper reserves all its rights, interests, lien, and claims with respect to: (i) the work performed and the materials furnished by it, (ii) any and all agreements between Pieper and the Debtors, (iii) the Property, (iv) the Lien, and (v) applicable law. Nothing in this Notice should be construed or deemed to waive any such rights, interests, lien, and claims, including, but not limited to, seeking relief from the stay.

Dated: August 28, 2023
Wilmington, Delaware

WOMBLE BOND DICKINSON (US) LLP

/s/ Ericka F. Johnson

Ericka F. Johnson (Del. Bar No. 5024)

1313 North Market Street, Suite 1200

Wilmington, Delaware 19801

Telephone: (302) 252-4320

Facsimile: (302) 252-4330

Email: ericka.johnson@wbd-us.com

Counsel to Pieper-Houston Electric, L.P.